

Reconsideration of the present application is respectfully requested. For purposes of discussing the present rejections, claim 30 is representative of Applicants' independent claims. Claim 30 recites:

30. A method of facilitating speech recognition comprising:
 using an automated language model learning process to acquire a set of language models based on PIM data associated with a user;
 recognizing an utterance by the user by using one of the language models; and
 using the recognized utterance of the user to identify and access a subset of the PIM data. (Emphasis added.)

First, Kanevsky does not disclose or suggest automatically learning a set of language models. Second, Kanevsky does not disclose or suggest doing so based on PIM data associated with a user. Third, Kanevsky does not disclose or suggest then using an utterance of the user, which has been recognized by using one of the language models acquired from the PIM data, to identify and access a subset of the PIM data. These three points are discussed further below.

1. Kanevsky does not disclose or suggest automatically learning a set of *language models*.

Kanevsky does disclose the ability to automatically build databases and models, such as user models (e.g., col. 7, lines 61-62; col. 8, lines 32-51). However, none of the databases or models which are automatically built are language models. A language model is a dataset that is used by an automatic speech recognizer to recognize an utterance. Examples of language models are speech recognition grammars and

statistical language models (see Applicants' specification, p. 11, lines 5-9). The user models discussed in Kanevsky, on the other hand, are used to identify the speaker; they are not language models, and they are not used for speech recognition (see col. 11, lines 3-21). Kanevsky does not even hint that the ability to automatically build this type of a model, or to automatically build anything else that could be construed as a language model within the meaning of the present application. For at least this reason, therefore, each of Applicants independent claims is patentable over the cited art.

2. Kanevsky does not disclose or suggest automatically learning a set of language models *based on PIM data* associated with a user.

A personal information manager (PIM) can be defined as a form of software that logs personal and business information, such as contacts, appointments, to do lists, etc. See, e.g., definitions from Google search result enclosed herewith. Kanevsky does disclose using certain types of personal information, such as phone numbers, trips, meetings, facsimile and e-mail information (col. 8, lines 51-59). However, assuming *arguendo* that information is interpreted as "PIM data", that information is not used to create language models. Kanevsky does not disclose or suggest automatically learning a set of language models based on those types of information or any information that could be interpreted as PIM data. For this additional reason, therefore, each of Applicants independent claims is patentable over the cited art.

3. Kanevsky does not disclose or suggest then using an utterance of the user, which has been recognized by using one of the language models acquired from the PIM data, *to identify and access a subset of the PIM data*.

The present invention as recited in claim 30 requires that an utterance of the user, which has been recognized by using one of the language models acquired from the PIM data, is used to identify and access a subset of the PIM data. For example, with the present invention a set of language models (e.g., speech recognition grammars or statistical language models) can be automatically generated from a user's personal address book, calendar and/or to do list. The user can then more effectively access that personal address book, calendar and/or to do list by using speech, which is recognized using the language models created from that data.

Assuming *arguendo* Kanevsky discloses PIM data and automatically learning language models from the PIM data, Kanevsky still does not disclose using speech recognition to allow the user to access the PIM data. In Kanevsky, the personal information such as phone number, emails, etc. are merely used by the system to verify the identity of the speaker. The system does not allow the user to access this information using speech. For this additional reason, therefore, each of Applicants independent claims is patentable over the cited art.

Each of Applicants' independent claims includes the limitations discussed above or substantially similar limitations. Accordingly, each of the independent claims and all claims which depend on them are patentable over the cited art.

Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent

claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

If any additional fee is required, please charge Deposit Account No. 02-2666.

Respectfully submitted,
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